

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION <hr/> THIS DOCUMENT RELATES TO: <i>Calderaro et al. v. Ethicon, Inc., et al.</i> Case No. 2:15-cv-02915	Master File No. 2:12-MD-02327 MDL No. 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
---	---

**FIRST AMENDED NOTICE OF VIDEO DEPOSITION OF
EDWARD LYNCH**

To: Edward Lynch
Ethicon, Inc.
One Johnson & Johnson Plaza
New Brunswick, NJ 08893

Notice is hereby given pursuant to Rule 30 of the Federal Rules of Civil Procedure that Plaintiffs will take the video deposition upon oral examination of Edward Lynch on July 17, 2019 at 10:00am at the Hilton Long Island/Huntington, 598 Broadhollow Rd, Melville, NY 11747.

This deposition is being taken for the purposes of discovery and such other purposes as authorized by law. The deposition will be taken before a person authorized by law to administer oaths, pursuant to Federal Rule of Civil Procedure 28, and shall continue from day to day until completed. The Deponent is asked to bring to the deposition the documents as described in Exhibit A regarding the above referenced case.

Date: July 8, 2019

By: /s Wendy R. Fleishman

Wendy R. Fleishman, Esq.
New York Registration Number: 2500429
Lief Cabraser Heimann and Bernstein, LLP
250 Hudson Street, 8th floor
New York, NY 10013-1413
Phone: (212) 355-9500
Fax: (212) 355-9592
wfleishman@lchb.com

Sarah R. London, Esq.
California Bar Number: 267083
Lief Cabraser Heimann and Bernstein, LLP
275 Battery Street, 29th floor
San Francisco, CA 94111-3339
Phone: (415) 956-1000
Fax: (415) 956-1008
slondon@lchb.com

Attorneys for Plaintiff

SCHEDULE A

The deponent shall bring to the deposition the following documents that are in his/her possession, control or custody:

1. Your current curriculum vitae or resume.
2. Any and all documents having to do with materials that you used, prepared, utilized, handed out, memorialized, and/or described in any and all meetings, telephone calls, conferences or contacts with Dr. Theodore Goldman or his colleagues, staff and assistants during the time period from July 2009 to the present.

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION <hr/> THIS DOCUMENT RELATES TO: <i>Calderaro et al. v. Ethicon, Inc., et al.</i> Case No. 2:15-cv-02915	Master File No. 2:12-MD-02327 MDL No. 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
---	---

CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s Wendy R. Fleishman
Wendy R. Fleishman, Esq.
New York Registration Number: 2500429
Lieff Cabraser Heimann and Bernstein, LLP
250 Hudson Street, 8th floor
New York, NY 10013-1413
Phone: (212) 355-9500
Fax: (212) 355-9592
wfleishman@lchb.com

Sarah R. London, Esq.
California Bar Number: 267083
Lieff Cabraser Heimann and Bernstein, LLP
275 Battery Street, 29th floor
San Francisco, CA 94111-3339
Phone: (415) 956-1000
Fax: (415) 956-1008
slondon@lchb.com

Attorneys for Plaintiff